

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Court File No. 18-cv-1776 (JRT/HB)

This Document Relates To: All Actions

**STIPULATION TO EXTEND
DEADLINES FOR MOTIONS TO
COMPEL RELATING TO JBS USA**

Plaintiffs and Defendant JBS USA Food Company (“JBS USA”), by and through their undersigned counsel, jointly stipulate to an extension of the deadline for Plaintiffs to file motions to compel arising from any remaining disputes about JBS USA’s amended responses and objections to Plaintiffs’ requests for production (“Amended RFP Responses”) as follows:

WHEREAS, pursuant to the Court’s Order dated November 24, 2020 (ECF No. 538), the current deadline for Plaintiffs to file a motion to compel relating to JBS USA’s Amended RFP Responses is January 15, 2021.

WHEREAS, Plaintiffs and JBS have had substantive discussions regarding JBS USA’s Amended RFP Responses, but have not yet exhausted the meet-and-confer process; and Plaintiffs and JBS USA believe they may be able to resolve or narrow the current disputes relating to JBS USA’s Amended RFP Responses if given more time to meet and confer.

WHEREAS, certain disputes regarding JBS USA’s Amended RFP Responses are intertwined with Plaintiff and JBS USA’s ongoing negotiations on search terms.

WHEREAS, the parties have agreed to provide an update to the Court regarding any disputes on document search methodology and search terms by January 22, 2021 (ECF No. 615).

WHEREAS, Plaintiffs and JBS USA will (1) work diligently to complete the meet-and-confer process relating to JBS USA's Amended RFP Responses by January 22, 2021; (2) provide an update to the Court as to the status of that process to accompany the parties' January 22, 2021 joint status update letter; and (3) to the extent any disputes remain regarding JBS USA's Amended RFP Responses, propose a mechanism and schedule for bringing such disputes to the Court.

NOW, THEREFORE, the parties stipulate to an Order consistent with the following:

1. The deadline for Plaintiffs to file any motions to compel relating to JBS USA's Amended RFP Responses is held in abeyance pending further order of the Court.
2. Plaintiffs and JBS USA shall work diligently to complete the meet-and-confer process relating to JBS USA's Amended RFP Responses by January 22, 2021.
3. Plaintiffs and JBS USA shall notify the Court in a joint status letter by January 22, 2021 whether any disputes remain regarding JBS USA's Amended RFP Responses. If any such disputes remain, Plaintiffs and JBS USA shall propose a mechanism and schedule for bringing such disputes to the Court.

Dated: January 14, 2021

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